Arnold&Porter

Peter L. Zimroth +1 212.836.7316 Direct Peter.Zimroth@arnoldporter.com

July 25, 2018

VIA ECF

Honorable Analisa Torres United States District Judge United States District Court Southern District of New York 500 Pearl Street New York, NY 10007-1312

Re: Floyd, et al. v. City of New York, 08-CV-1034 (AT),

Ligon, et al. v. City of New York, et al., 12-CV-2274 (AT), Davis, et al. v. City of New York, et al., 10-CV-0699 (AT),

Application for Confidentiality Order

Dear Judge Torres,

Throughout the course of the remedial phase of the above-captioned actions, the parties have met and consulted with the Monitor and Facilitator to help develop remedial measures. During these meetings and consultations, the parties have reviewed and discussed confidential material. I believe all stakeholders' interests are best served by ensuring confidentiality in the remedial phase of these actions. Without a confidentiality order that clearly sets forth the terms by which confidential material will be handled, the effectiveness of the remedial phase of these actions may be seriously compromised. For these reasons, I am submitting this application for a confidentiality order.

Respectfully submitted,

/s/ Peter L. Zimroth

Peter L. Zimroth Monitor

Enclosure: Proposed Order